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**ATTORNEYS FOR PLAINTIFF**

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF ARIZONA**

IN RE: BARD IVC FILTERS PRODUCTS )  
LIABILITY LITIGATION )

Case No.: 2:15-MD-02641-DGC

This document relates to: )

Assigned to the Honorable David G. Campbell

*Pamela M. Smith v. C.R. Bard, Inc., et al.;* )  
**Case No. 2:17-cv-03089-DGC** )

**PLAINTIFF’S RESPONSE TO DEFENDANTS  
C. R. BARD INC. AND BARD PERIPHERAL  
VASCULAR INC.’S MOTION TO DISMISS  
DUPLICATIVE COMPLAINTS FILED IN  
THE MDL**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Pamela M. Smith (“Plaintiff”) hereby files her response to Defendants C. R. Bard Inc. and Bard Peripheral Vascular Inc.’s Motion to Dismiss Duplicative Complaints Filed in the MDL.

The parties have agreed that Plaintiff’s above-entitled case should be dismissed without prejudice to resolve this issue. Thus, concurrently herewith, Plaintiff is filing a stipulation of dismissal of her case without prejudice.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that her case be dismissed without prejudice, with the parties bearing their own costs, as requested in the concurrently-filed stipulation of dismissal without prejudice.

Dated: March 7, 2019

Respectfully submitted,

**FREESE & GOSS, PLLC**

By: s/ Richard A. Freese  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 7, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send notification of such filing to all counsel of record.

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